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4 **UNITED STATES DISTRICT COURT**  
5 **SOUTHERN DISTRICT OF NEVEDA**  
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7 YANITA KUZOVA and YAVOR  
8 KUZOV, individually and on behalf of  
9 all similarly situated individuals

10 Plaintiffs

11 vs.

12 UNITED STATES DEPARTMENT  
13 OF HOMELAND SECURTY, et al.

14 Defendants  
15

) Civil Action

) CASE NO.: 2:10-cv-01711-CMN-  
) LRL

) JUDGE: NAVARRO

) MAGISTRATE: JOHNSON

) **PLAINTIFF YAVOR KUZOV'S**  
) **MOTION FOR DISMISSAL OF**  
) **COUNT ONE OF THE**  
) **COMPLAINT AS IT RELATES TO**  
) **HIM DUE TO NATURALIZATION**

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18 COMES NOW Plaintiff Yavor Kuzov, through his attorney of record,  
19 Nicolette Glazer Esq., and in support of this motion for partial dismissal of this  
20 matter state as follows:  
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22 1. On 2 October 2010 Yanita Kuzova and Yavor Kuzov, individually  
23 and on behalf of all similarly situated individuals, filed a lawsuit against the  
24

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LAW OFFICES OF LARRY R. GLAZER  
1875 CENTURY PARK EAST, SUITE #700  
CENTURY CITY, CALIFORNIA 90067

1 named defendants in the United State District Court for the Southern District of  
2 Nevada, alleging causes of actions for *de novo* judicial determination of  
3 application for naturalization pursuant to 8 U.S.C. §1447(b); writ of mandamus  
4 for failure to adjudicate a properly filed application for naturalization within 120  
5 days after examination; unreasonable delay under the Administrative Procedures  
6 Act, and attorney fees and costs under EAJA.  
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9         2.       After the filing of the complaint Defendant USCIS granted Plaintiff  
10 Yavor Kuzov's application for naturalization, a relief USCIS had previously  
11 refused to accord to Plaintiff without good cause. *See* Exhibit A.  
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2 WHEREFORE Plaintiff Yavor Kuzov respectfully requests that this Court  
3 dismiss Count One of the complaint [8 U.S.C. §1447(b) relief] as it relates to  
4 him pursuant to FRAP, Rule 42(b) since the request has been rendered moot by  
5 the grant of naturalization.  
6

7 Respectfully submitted by  
8 LAW OFFICES OF LARRY R. GLAZER  
9 \_\_\_\_\_s/Nicolette Glazer\_\_\_\_\_

10 Nicolette Glazer, CA Bar # 208713  
11 1875 Century Park East, Suite #700  
12 Century City, California 90067  
13 ATTORNEY FOR PLAINTIFFS

14 **IT IS SO ORDERED** this 5th day of April, 2011.

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17 \_\_\_\_\_  
18 Gloria M. Navarro  
19 United States District Judge  
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1875 CENTURY PARK EAST, SUITE #700  
CENTURY CITY, CALIFORNIA 90067

## UNITED STATES OF AMERICA

## OFFICE OF THE SECRETARY OF



## DEPARTMENT OF HOMELAND SECURITY

No. 33789107

USCIS Registration No. A047642887

Personal description of holder  
as of date of naturalization:

Date of birth: JANUARY 30, 1990

Sex: MALE

Height: 5 feet 7 inches

Marital status: SINGLE

Country of former nationality:  
BULGARIAI certify that the description given is true, and that the photograph affixed  
hereto is a likeness of me.

(Complete and affix signature of holder)

Be it known that pursuant to an application filed with the Secretary of  
Homeland Security

at ATLANTA, GEORGIA

The Secretary having found that:

YAYOR GEORGIEV KUZOV

residing at: ATLANTA, GEORGIA

having complied in all respects with all of the applicable provisions of the  
naturalization laws of the United States, being entitled to be admitted as  
a citizen of the United States, and having taken the oath of allegiance at a  
ceremony conducted by

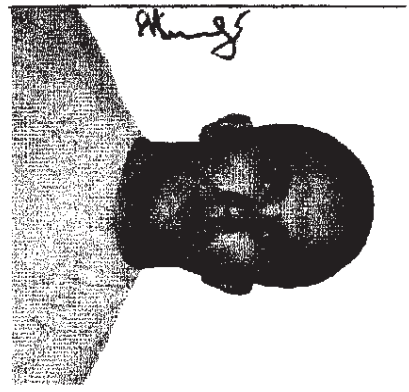
U.S. CITIZENSHIP AND IMMIGRATION SERVICES

at: FORT BENNING, GEORGIA

on: DEC 08 2010

such person is admitted as a citizen of the United States of America.

U. S. Citizenship and Immigration Services



DEPARTMENT OF HOMELAND SECURITY

REPLACES FORMS 100-1 AND 100-2

FORM N-590 (REV. 08/10)